

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

SEAN OWENS,

**Plaintiff,**

V.

## **EXPERIAN INFORMATION SOLUTIONS, INC.,**

## **EQUIFAX INFORMATION SERVICES, LLC,**

**EDUCATIONAL CREDIT  
MANAGEMENT CORPORATION**  
*(agent of ECMC Group)*

## Defendants.

Case No. 4:23-cv-00079-SDJ-KPJ

**DEFENDANTS' NOTICE OF RELATED PROCEEDING AND JOINT MOTION  
REQUESTING STATUS CONFERENCE**

Defendants Experian Information Solutions, Inc., Equifax Information Services, LLC, and Educational Credit Management Corporation (collectively, the “Defendants”) hereby file this Notice of Related Proceeding and Joint Motion Requesting Status Conference. In support of this Motion, Defendants state that they seek to address the recent transfer of this action from the United States District Court for the Central District of California, and to discuss the impact Case No. 4:20-cv-00665-SDJ-KPJ, a duplicative action previously filed by Plaintiff Sean Owens (“Plaintiff”) and pending before this Court, has on the disposition of the instant proceeding.

Plaintiff initiated this action against Defendants in the Central District of California on August 29, 2022, in a case styled *Sean Owens v. Experian Information Solutions, Inc. et al.*, Civil Action No. 8:22-cv-01601-FWS-JDW (the “California action”). Defendants filed a Joint Motion

to Dismiss or, in the Alternative, Motion to Stay (“Joint Motion to Dismiss or Stay”) on the grounds that the California action was duplicative to an action previously filed by Plaintiff and pending in the Eastern District of Texas in a case styled *Owens v. Trans Union, LLC, et al.*, Civil Action No. 4:20-cv-665-SDJ-KPJ (the “Texas Action”). *See* ECF No. 19. The Central District Court granted Defendants’ Motion to Dismiss or Stay on January 27, 2023, and Ordered that the duplicative California action be transferred to the United States District Court for the Eastern District of Texas. *See* ECF No. 32. The California action was, in fact, transferred and is now pending before this Court. *See* ECF No. 33.<sup>1</sup>

Defendants believe that a status conference would most efficiently and effectively address the transfer and impact of Case No. 4:20-cv-665-SDJ-KPJ on the instant proceeding. For the reasons stated herein, the Parties respectfully request that the Court grant this Joint Motion Requesting Status Conference and in doing so, set a status conference at the Court’s earliest convenience.

Respectfully submitted,

/s/ Mark A. Platt

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<sup>1</sup> To avoid litigating two nearly identical actions in the same forum, Defendants filed a Joint Motion to Stay Action Pending Final Judgment in the Prior Related Action on February 10, 2023. *See* ECF No. 37. That Motion is pending before the Court.

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*Counsel for Experian Information Solutions, Inc.*

**CERTIFICATE OF CONFERENCE**

I hereby certify that on or about February 1, 2023, and on February 22, 2023, counsel for Defendants made efforts to confer with Plaintiff Sean Owens regarding the relief requested in this Motion, as demonstrated in the attached Exhibit A. Defendants did not receive a response from Mr. Owens regarding the relief requested.

/s/ Mark A. Platt  
Mark A. Platt

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing pleading has been furnished to Plaintiff and all parties of record via the CM/ECF system, and by first-class mail to the *pro se* plaintiff on February 23, 2023, as follows:

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/s/ Mark A. Platt  
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